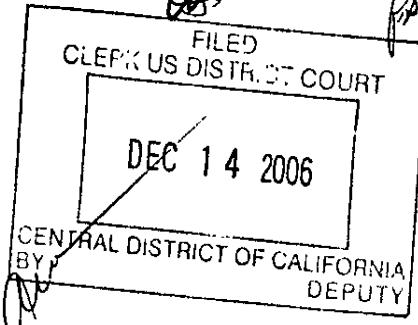


ORIGINALSCANNED
BY [signature]

1 ADRIENNE C. PUBLICOVER (SBN 161432)
 2 DENNIS J. RHODES (SBN 168417)
 3 PAMELA P. PHAM (SBN 235493)
 4 WILSON, ELSER, MOSKOWITZ,
 5 EDELMAN & DICKER LLP
 525 Market Street, 17th Floor
 San Francisco, CA 94105
 Telephone: (415) 433-0990
 Facsimile: (415) 434-1370
 6 Attorneys for Plaintiff
 7 AMERICAN GENERAL LIFE
 INSURANCE COMPANY



PH 2:59

M.M.

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

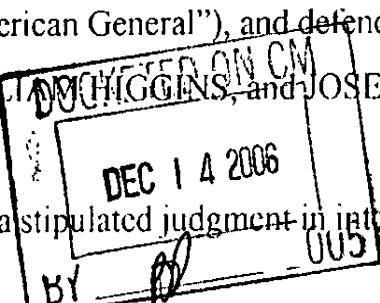
12 AMERICAN GENERAL LIFE
 13 INSURANCE COMPANY,
 14 Plaintiff,
 15 v.
 16 DAVID HIGGINS, RONALD
 17 HIGGINS, WILLIAM HIGGINS,
 18 JOSEPH WALKER and DOES 1-50,
 Defendants.

6550 CASE NO. CV06-6500 FMC (JWJx)
**STIPULATION AND ORDER FOR
 ENTRY OF JUDGMENT IN
 INTERPLEADER**

The Honorable Florence-Marie Cooper

19 IT IS HEREBY STIPULATED, by and between plaintiff AMERICAN
 20 GENERAL LIFE INSURANCE COMPANY, formerly known as The Old Line Life
 21 Insurance Company of America, ("American General"), and defendants DAVID
 22 HIGGINS, RONALD HIGGINS, WILLIAM HIGGINS, and JOSEPH WALKER, as
 23 follows:

24 1. That this Court may enter a stipulated judgment in interpleader in the
 25 form attached hereto as Exhibit A;
 26 2. That, by reason of the death of Mauricina Altier ("decedent"), on May
 27 24, 2006, the sum of One Hundred Thousand Dollars (\$100,000.00)



STIPULATION AND ORDER FOR ENTRY OF JUDGMENT IN INTERPLEADER
 USDC CDCA No. CV06-6500 FMC (JWJx)
 251508.3

1 ("Benefit proceeds") became payable pursuant to Life Insurance Policy No. GL-
2 2314363 (the "Policy") that was issued by The Old Line Life Insurance Company of
3 America to the decedent, effective September 28, 1998;

4 3. That defendants David Higgins, Ronald Higgins, William Higgins, and
5 Joseph Walker each claim entitlement to some or all of the Benefit Proceeds and
6 that, to date, no other person or entity currently makes claim to American General
7 for the Benefit Proceeds;

8 4. That American General was ready, willing, and able to deliver the
9 Benefit Proceeds to the person(s) legally entitled thereto. However, by reason of the
10 actual and potential competing claims to the Benefit Proceeds, American General
11 did not know and was unable to determine the person(s) legally entitled to them;

12 5. That concurrently with the filing of its complaint in interpleader,
13 American General deposited with the Clerk of this Court the Benefit Proceeds,
14 totaling One Hundred and One Thousand Two Hundred Fifty-Three Dollars and
15 Forty-Eight Cents (\$101,253.48), which represents the insurance proceeds payable
16 under the Policy, plus interest;

17 6. That having deposited the monies with the Clerk of the Court on or
18 about October 13, 2006, American General, its predecessors, successors, affiliates,
19 parent corporation, officers and agents are fully and forever released, discharged,
20 and acquitted from any liability of any kind or nature whatsoever under the Policy or
21 by reason of the death of the decedent as to any and all claims, charges, demands, or
22 otherwise that exist now or may arise at any time in the future;

23 7. That defendants, David Higgins, Ronald Higgins, William Higgins, and
24 Joseph Walker, consent to the jurisdiction of this Court;

25 8. That American General is entitled to fees of \$1,650.00 and costs of
26 \$350.00, for a total of \$2,000.00, to be paid out of the Benefit Proceeds deposited
27 with the Clerk of this Court;

1 9. That the first disbursement of the Benefit Proceeds in the amount of
2 \$2,000.00 will be paid to American General for the attorney's fees and costs it has
3 incurred in connection with this litigation;

4 10. That the second disbursement of the remaining Benefit Proceeds, in the
5 amount of \$99,253.48, will be made in the manner set forth below;

6 11. That each of the four defendants, David Higgins, Ronald Higgins,
7 William Higgins, and Joseph Walker, is entitled to and will receive \$24,813.37,
8 which is an amount that is equal to twenty-five percent of the remaining Benefit
9 Proceeds, as set forth above;

10 12. That defendants David Higgins, Ronald Higgins, William Higgins, and
11 Joseph Walker are permanently enjoined from instituting or prosecuting any
12 proceeding in any state or United States court against American General, its
13 predecessors, successors, affiliates, parent corporation, officers and agents with
14 respect to the Benefit Proceeds, or any action in connection with this Policy; and

13. That American General is dismissed from this action with prejudice.

IT IS SO STIPULATED.

18 | Dated: December 12, 2006

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**

By:

Adrienne C. Publicover
Dennis J. Rhodes
Pamela P. Pham
Attorneys for Plaintiff
**AMERICAN GENERAL LIFE
INSURANCE COMPANY**

Dated:

By:

David Higgins, Defendant

Attach Notarial Endorsement

1 Dated: _____ By: _____
2 Ronald Higgins, Defendant

3 Attach Notarial Endorsement

5 Dated: Dec. 7, 2006 By: David Williams Higgins
6 David Williams Higgins, Defendant

7 Attach Notarial Endorsement

9 Dated: _____ By: _____
10 Joseph Walker, Defendant

11 Attach Notarial Endorsement

14 **ORDER**

16 PURSANT TO STIPULATION, IT IS SO ORDERED.

17 Dated: Dec. 13, 2006


18 HON. FLORENCE-MARIE COOPER
19 United States District Court Judge

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENTState of CALIFORNIACounty of LOS ANGELESOn 12-7-06 before me, Robert W. Lyon, NOTARY PUBLIC
DATE NAME, TITLE OF OFFICER - E.G., "JANE DOE, NOTARY PUBLIC"personally appeared DAVID W. HIGGINS
NAME(S) OF SIGNER(S)

personally known to me - OR - proved to me on the basis of satisfactory evidence
 to be the person(s) whose name(s) is/are
 subscribed to the within instrument and ac-
 knowledged to me that he/she they executed
 the same in his/her their authorized
 capacity(ies), and that by his/her their
 signature(s) on the instrument the person(s),
 or the entity upon behalf of which the
 person(s) acted, executed the instrument.

WITNESS my hand and official seal.

SIGNATURE OF NOTARY

THIS CERTIFICATE MUST BE ATTACHED TO
THE DOCUMENT DESCRIBED AT RIGHT:**OPTIONAL SECTION****CAPACITY CLAIMED BY SIGNER**

Though statute does not require the Notary to
 fill in the date below, doing so may prove
 invaluable to persons relying on the document.

 INDIVIDUAL CORPORATE OFFICER(S)

TITLE(S)

 PARTNER(S) LIMITED GENERAL ATTORNEY-IN-FACT TRUSTEE(S) GUARDIAN/CONSERVATOR OTHER: _____**SIGNER IS REPRESENTING:**

NAME OF PERSON(S) OR ENTITY(IES)

SELF**OPTIONAL SECTION**

TITLE OR TYPE OF DOCUMENT

NUMBER OF PAGES Four (4)Stipulation and Order for
Entry of Judgment in InterpuderDATE OF DOCUMENT 12-7-06

1 Dated: 12-6-06

2 By: RH
Ronald Higgins, Defendant

3 Attach Notarial Endorsement

5 Dated: _____

6 By: _____
Williams Higgins, Defendant

7 Attach Notarial Endorsement

9 Dated: _____

10 By: _____
Joseph Walker, Defendant

11 Attach Notarial Endorsement

14 **ORDER**

16 PURSANT TO STIPULATION, IT IS SO ORDERED.

18 Dated: _____

19 HON. FLORENCE-MARIE COOPER
United States District Court Judge

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of CALIFORNIA }
County of LOS ANGELES }

On 12-6-06 before me, Robert W. Lyon, NOTARY PUBLIC
DATE NAME, TITLE OF OFFICER - E.G., "JANE DOE, NOTARY PUBLIC"

personally appeared Ronald Higgins
NAME(S) OF SIGNER(S)

personally known to me - OR - proved to me on the basis of satisfactory evidence
to be the person(s), whose name(s) is/are
subscribed to the within instrument and ac-
knowledged to me that he/she they executed
the same in his/her their authorized
capacity(ies), and that by his/her their
signature(s) on the instrument the person(s),
or the entity upon behalf of which the
person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Robert W. Lyon
SIGNATURE OF NOTARY

OPTIONAL SECTION

TITLE OR TYPE OF DOCUMENT

NUMBER OF PAGES Form(4)

DATE OF DOCUMENT

OPTIONAL SECTION

CAPACITY CLAIMED BY SIGNER

Though statute does not require the Notary to
fill in the data below, doing so may prove
invaluable to persons relying on the document.

INDIVIDUAL

CORPORATE OFFICER(S)

TITLE(S)

PARTNER(S) LIMITED

GENERAL

ATTORNEY-IN-FACT

TRUSTEE(S)

GUARDIAN/CONSERVATOR

OTHER: _____

SIGNER IS REPRESENTING:

NAME OF PERSON(S) OR ENTITY(IES)

SELF

THIS CERTIFICATE MUST BE ATTACHED TO
THE DOCUMENT DESCRIBED AT RIGHT:

© 2006 First Legal Support, Inc.

ROBERT W. LYON
Commission # 1668071
Notary Public - California
Los Angeles County
My Comm. Expires May 19, 2010

SIGNATURE OF NOTARY

STIPULATION and Order for

Entry of Judgment in Interpleader

12-6-06

1 Dated: _____ By: _____
2 Ronald Higgins, Defendant
3

SCANNED

4 Attach Notarial Endorsement
5

6 Dated: 12/07/2006 By: Williams Higgins
7 Williams Higgins, Defendant
8

9 Attach Notarial Endorsement
10

11 Dated: _____ By: _____
12 Joseph Walker, Defendant
13

14 Attach Notarial Endorsement
15

16 PURSANT TO STIPULATION, IT IS SO ORDERED.
17

18 Dated: _____ HON. FLORENCE-MARIE COOPER
19 United States District Court Judge
20
21
22
23
24
25
26
27
28

SCANNED

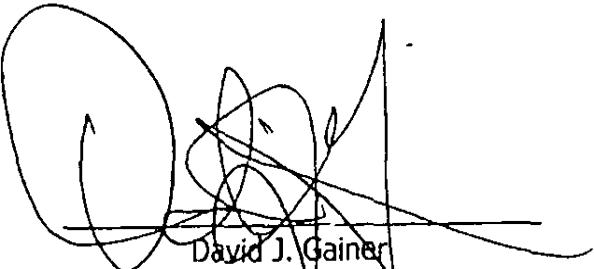


**CONSULATE GENERAL OF THE
UNITED STATES OF AMERICA**

Commonwealth of Australia)
State of Victoria)
City of Melbourne) ss
Consulate General of the)
United States of America)

I, David J. Gainer, Consul of the United States of America at Melbourne, Victoria, Australia, duly commissioned and qualified, do hereby certify that on the 7th day of December, 2006, before me personally appeared William Blackstone Higgins II, personally known, or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to, and who executed the annexed instrument, and being informed by me of the contents of the said instrument he duly acknowledged to me that he executed the same freely and voluntarily for the uses and purposes therein mentioned.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal this 7th day of December, 2006.


David J. Gainer
Consul of the United States of America

1 Dated: _____ By: _____
2 Ronald Higgins, Defendant
3
4

5 Attach Notarial Endorsement
6
7

8 Dated: _____ By: _____
9 Williams Higgins, Defendant
10
11

12 Attach Notarial Endorsement
13

14 Dated: 12-06-06 By: Joseph Walker, Defendant
15
16

17 Attach Notarial Endorsement
18

19 **ORDER**
20

21 **PURSANT TO STIPULATION, IT IS SO ORDERED.**
22

23 Dated: _____ HON. FLORENCE-MARIE COOPER
24 United States District Court Judge
25
26
27
28

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

No. 8193

State of CALIFORNIA }
 County of LOS ANGELES }

On 12-6-06 before me, Robert W. Lyon, NOTARY PUBLIC
 DATE NAME, TITLE OF OFFICER - E.G., "JANE DOE, NOTARY PUBLIC"

personally appeared Joseph Walker
 NAME(S) OF SIGNER(S)

personally known to me - OR - proved to me on the basis of satisfactory evidence
 to be the person(s) whose name(s) is/are
 subscribed to the within instrument and ac-
 knowledged to me that he/she/they executed
 the same in his/her/their authorized
 capacity(ies), and that by his/her/their
 signature(s) on the instrument the person(s),
 or the entity upon behalf of which the
 person(s) acted, executed the instrument.

WITNESS my hand and official seal.

SIGNATURE OF NOTARY

THIS CERTIFICATE MUST BE ATTACHED TO
 THE DOCUMENT DESCRIBED AT RIGHT:

OPTIONAL SECTION**CAPACITY CLAIMED BY SIGNER**

Though statute does not require the Notary to
 fill in the data below, doing so may prove
 invaluable to persons relying on the document.

INDIVIDUAL

CORPORATE OFFICER(S)

TITLE(S)

PARTNER(S) LIMITED

GENERAL

ATTORNEY-IN-FACT

TRUSTEE(S)

GUARDIAN/CONSERVATOR

OTHER: _____

SIGNER IS REPRESENTING:

NAME OF PERSON(S) OR ENTITY(IES)

OPTIONAL SECTION

TITLE OR TYPE OF DOCUMENT

NUMBER OF PAGES

Stipulation and Order For
Entry of Judgment in Interpleader

DATE OF DOCUMENT

ROBERT W. LYON
 Notary Public, California
 Commission # 1668071
 Los Angeles County
 My Comm. Expires May 19, 2010

EXHIBIT A

EXHIBIT A

1 ADRIENNE C. PUBLICOVER (SBN 161432)
DENNIS J. RHODES (SBN 168417)
2 PAMELA P. PHAM (SBN 235493)
WILSON, ELSER, MOSKOWITZ,
3 EDELMAN & DICKER LLP
525 Market Street, 17th Floor
4 San Francisco, CA 94105
Telephone: (415) 433-0990
5 Facsimile: (415) 434-1370

6 Attorneys for Plaintiff
7 AMERICAN GENERAL LIFE
INSURANCE COMPANY

8

11

12 AMERICAN GENERAL LIFE
INSURANCE COMPANY,

13 Plaintiff,

v.

DAVID HIGGINS, RONALD
HIGGINS, WILLIAM HIGGINS,
JOSEPH WALKER and DOES 1-50.

Defendants

CASE NO. CV06-6500 FMC (JWJx)

**STIPULATED JUDGMENT IN
INTERPLEADER**

The Honorable Florence-Marie Cooper

20 Upon reading the Stipulation and Order for Entry of Judgment in Interpleader,
21 and it appearing that plaintiff AMERICAN GENERAL LIFE INSURANCE
22 COMPANY, formerly known as The Old Line Life Insurance Company of America,
23 ("American General"), has brought this action in interpleader, that this Court has
24 jurisdiction of the parties and of the subject herein, and that good cause appearing
25 therefore,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

27

28

1 1. That American General properly filed its complaint in interpleader and
2 for declaratory relief on October 13, 2006, and this is a proper cause for interpleader;

3 2. That, by reason of the death of Mauricina Altier ("decedent"), on May
4 24, 2006, the sum of One Hundred Thousand Dollars (\$100,000.00)
5 ("Benefit proceeds") became payable pursuant to Life Insurance Policy No. GL-
6 2314363 (the "Policy") that was issued by The Old Line Life Insurance Company of
7 America to the decedent effective September 28, 1998;

8 3. That defendants David Higgins, Ronald Higgins, William Higgins, and
9 Joseph Walker each claim entitlement to some or all of the Benefit Proceeds and
10 that, to date, no other person or entity currently makes claim to American General
11 for the Benefit Proceeds;

12 4. That American General was ready, willing, and able to deliver the
13 Benefit Proceeds to the person(s) legally entitled thereto. However, by reason of the
14 actual and potential competing claims to the Benefit Proceeds, American General
15 did not know and was unable to determine the person(s) legally entitled to them;

16 5. That concurrently with the filing of its complaint in interpleader,
17 American General deposited with the Clerk of this Court the Benefit Proceeds,
18 totaling One Hundred and One Thousand Two Hundred Fifty-Three Dollars and
19 Forty-Eight Cents (\$101,253.48), which represents the insurance proceeds payable
20 under the Policy, plus interest;

21 6. That having deposited the monies with the Clerk of the Court on or
22 about October 13, 2006, American General, its predecessors, successors, affiliates,
23 parent corporation, officers and agents are fully and forever released, discharged,
24 and acquitted from any liability of any kind or nature whatsoever under the Policy or
25 by reason of the death of the decedent as to any and all claims, charges, demands, or
26 otherwise that exist now or may arise at any time in the future;

27
28

1 7. That American General is entitled to fees of \$1,650.00 and costs of
2 \$350.00, for a total of \$2,000.00, to be paid out of the Benefit Proceeds deposited
3 with the Clerk of this Court, and by order of this Court, the Clerk of this Court shall
4 pay such amounts to plaintiff American General, out of the Benefit Proceeds
5 deposited with the Clerk of this Court, by check payable to:
6

7 “AMERICAN GENERAL LIFE INSURANCE COMPANY” and
8 said check to be sent to “Christine F. Leighton, AIG/American
9 General, 2929 Allen Parkway, A10-01, Houston, Texas 77019-
10 2155”;

11
12 8. That the second disbursement of the remaining proceeds, in the amount
13 of \$99,253.48, will be made to the defendants, David Higgins, Ronald Higgins,
14 William Higgins, and Joseph Walker, in the manner set forth below;

15 9. That each of the four defendants, David Higgins, Ronald Higgins,
16 William Higgins, and Joseph Walker, is entitled to an equal part of the remaining
17 proceeds or twenty-five percent of the remaining Benefit Proceeds;

18 10. That by order of this Court, the Clerk of this Court shall pay each
19 defendant out of the Benefit Proceeds deposited with the Clerk of this Court, by
20 check payable to each defendant, as set forth below

21 a. A check in the amount of \$24,813.37, made payable to “DAVID
22 HIGGINS” and said check to be sent to “720 West Mariposa
23 Street, Altadena, California 91001”;
24 b. A check in the amount of \$24,813.37, made payable to
25 “RONALD HIGGINS” and said check to be sent to “720 West
26 Mariposa Street, Altadena, California 91001”;

c. A check in the amount of \$24,813.37, made payable to
"WILLIAM HIGGINS" and said check to be sent to "2 / 3
Manikato Avenue, Mordialloc, Victoria, Australia 3195"; and

d. A check in the amount of \$24,813.37, made payable to "JOSEPH
WALKER" and said check to be sent to "5046 Eagle Rock
Boulevard, Altadena, California 91001";

11. That defendants David Higgins, Ronald Higgins, William Higgins, and Joseph Walker are permanently enjoined from instituting or prosecuting any proceeding in any state or United States court against American General, its predecessors, successors, affiliates, parent corporation, officers and agents with respect to the Benefit Proceeds, or any action in connection with this Policy; and

12. That American General is dismissed from this action with prejudice;

13 13. That upon issuance of the checks to defendants David Higgins, Ronald
14 Higgins, William Higgins, and Joseph Walker, the Clerk of this Court shall send a
15 copy of the transmittal letter to American General's attorney of record confirming
16 mailing of the payment so that American General can document and close its file.

IT IS SO ORDERED.

Dated:

HON. FLORENCE-MARIE COOPER
United States District Court Judge